

**IN THE UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF MISSISSIPPI**

**IN THE MATTER OF:**

**MARKESHA RESHA MUMPHARD**

**CHAPTER 13:**

**CASE NO. 24-00223-JAW**

**TRUSTEE'S OBJECTION TO  
DEBTOR'S MOTION TO ALLOW PAYMENT ARREARAGES**

COMES NOW, Semoune Ellis on behalf of Torri Parker Martin, the duly appointed and qualified Standing Trustee in the above cause and files this Objection to Debtor's Motion to Allow Payment Arrearages (Docket #47) and in support thereof, would show unto the Court the following:

1. The Debtor proposes to cure the current plan payment delinquency over the remaining plan term with ongoing payments to resume in August 2025.
2. The Debtor's Motion requests that ongoing mortgage payments be amortized over the life of the plan. However, no mortgage payments are being paid through the plan.
3. The plan was confirmed April 23, 2024 (Docket #23).
4. The Trustee last received a full plan payment in July 2024 and received a partial plan payment in June 2025.
5. The Debtor's plan is currently two months (2) in arrears and delinquent (\$1,780.22) through July 2025.
6. The Debtor has missed plan payments causing delinquency to accrue over the completed plan months.
7. The Code provides that Debtors will be able to make all plan payments and comply with the plan. (11 U.S.C. § 1325(a)(6)). (emphasis added).
8. It is in the best interest of the bankruptcy estate for the Debtor to immediately resume remitting full plan payments in July 2025.

**WHEREFORE, PREMISES CONSIDERED,** the Trustee prays that this Objection be received and filed and at the hearing hereon an Order be entered denying the Debtor's Motion; or in the alternative, should the Debtor's Motion be granted, the Debtor be required to immediately resume remitting full plan payments in July 2025 after which the wage order be adjusted to increase the plan payments to cure the arrearages and amortize the delinquency to allow for timely plan payment completion; and any other general relief to which the Trustee and this bankruptcy estate may be entitled.

DATED: July 1, 2025

Respectfully Submitted,

/s/ Semoune Ellis

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Standing Chapter Thirteen Trustee  
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**CERTIFICATE OF SERVICE**

I, Semoune Ellis, do hereby certify that I have this day submitted a true and correct copy of the above and foregoing Objection to the following, by electronic, ECF filing, and/or mail to: Abigail Marbury, Asst. U. S. Trustee,  
[USTPRegion05.JA.ECF@usdoj.gov](mailto:USTPRegion05.JA.ECF@usdoj.gov), 501 E. Court Street, Suite 6.430, Jackson, MS 39201, and

**Attorney for Debtor:**

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DATED: July 1, 2025

/s/Semoune Ellis  
Semoune Ellis